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March 11, 2022

Washington State Building Code Council  
1500 Jefferson Street SE  
Olympia, WA 98501

**Re: Rheem Manufacturing Company Comments on Washington State Building Code  
Proposal 21-GP1- 136 and Washington State Building Code Proposal 21-GP1- 103**

Dear Members of the Washington State Building Code Council:

Rheem Manufacturing Company (Rheem) appreciates the opportunity to comment on the incorporation of Proposal 21-GP1- 136 and 21-GP1-103 in the Washington State Building Code.

Rheem is an industry leader in total heating, cooling, refrigeration and water heating solutions, headquartered in Atlanta, Georgia and with U.S. based manufacturing facilities in California, Alabama, Arkansas, Connecticut, and North Carolina and distribution facilities throughout the U.S., Canada and around the world. Rheem is committed to a clean energy future and continues to bring to market products that advance the goals of emissions reduction at an affordable price to the homeowner, working cooperatively with environmental agencies and regulators.

Rheem supports the broader objectives of the Washington State Building Code Council to prescribe requirements for the use of high-efficiency heating, cooling and service water heating equipment, including a rapid adoption of heat pump technologies. The focus of the Washington State code proposal on the commercial building sector and inclusion of retrofits creates several compliance challenges, however. To support an effective transition, the code must provide compliance pathways that consider product availability, technology maturity and the accompanying limited applications and building system solutions in many commercial end-uses. Accordingly, the code should retain compliance pathways for use of electric resistance



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technologies and high-efficiency fossil-fuel fired equipment for certain applications that are technically not feasible, economically justified or lack available and scalable heat pump solutions.

More specifically, the proposed revisions in 21-GP1-136 and 21-GP1-103 are concerning in that they could severely limit the availability of affordable technology and equipment inventory available in the proposed time frame. The prescriptive compliance path prohibits, in the very near term, the use of several types of equipment that utilize fossil fuels and electric resistance while limiting use of electric resistance as back-up, without taking into account factors such as complicated heating/cooling loads and varying climate regions. The prohibitions are further problematic when compounded with overly prescriptive system design requirements, with the potential result being significantly limited consumer equipment options and availability. Such amendments require thorough technical and market analysis prior to implementation.

Rheem agrees with the Air-Conditioning, Heating and Refrigeration Institute (AHRI) comments on the technical feasibility, affordability and economic justification, regulatory process, and timing for code implementation. Code proposals to set technology restricting effective dates must be informed through the full market availability of heat pump equipment covered by the code changes and timelines that recognize COVID-related global supply chain shortages that are likely to persist for an extended period. Absent these considerations, the code could result in higher costs and a misalignment in the availability of space and water heating equipment in certain end-use markets.

As Washington State rapidly moves to decarbonize its building stock, appliances, HVAC and energy infrastructure, the Washington State Building Code Council must appropriately balance the need to set a carbon neutral pathway *today* while acknowledging more work is needed to increase the electric equipment readiness, labor force training and market adoption of *tomorrow*.



As a leader in heat pump technology for both space and water heating, Rheem would welcome the opportunity to work with the Technical Assistance Group and other state officials to explore various scenarios to achieve Washington State's climate goals and increases the adoption of heat pump technologies.

Rheem appreciates the opportunity to make these comments and thanks you for your consideration.

A handwritten signature in black ink that reads "Karen B. Meyers".

Karen Meyers  
Vice President, Government Affairs  
Rheem Manufacturing Company

